



COMMONWEALTH OF KENTUCKY
OFFICE OF THE ATTORNEY GENERAL

GREGORY D. STUMBO
ATTORNEY GENERAL

1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT, KY 40601-8204

December 27, 2005

Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

VIA HAND-DELIVERY

RE: 2005-00186, Attorney General's
Supplemental Requests for Information

RECEIVED

DEC 27 2005

PUBLIC SERVICE
COMMISSION

Dear Ms. O'Donnell:

Enclosed herewith please find the Attorney General's Supplemental Requests for Information in Commission Case No. 2005-00186. This document was filed with the Commission on December 13, 2005. Due to a clerical error, however, this document contained a typographical error, and was not signed. We hereby submit a corrected and signed version of this document. Thank for your attention to this matter.

Yours Very Truly,

A handwritten signature in black ink, appearing to read "Lawrence W. Cook".

Lawrence W. Cook
Assistant Attorney General

LWC
Enclosure



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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DEC 27 2005

PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INQUIRY INTO LIMITATIONS)
OF USE FOR TARIFFED SERVICES) ADMINISTRATIVE
DESIGNATED OR OTHERWISE) CASE NO. 2005-00186
REFERRED TO AS UNLIMITED)

ATTORNEY GENERAL'S SUPPLEMENTAL REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Supplemental Set of Requests for Information to the entities set forth in the Attorney's General's attached list of responding companies. Said Supplemental Requests for Information are to be answered as expeditiously as possible, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional

information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

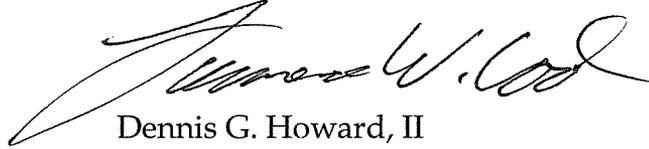
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer;

and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,
GREGORY D. STUMBO
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "Dennis G. Howard, II". The signature is fluid and cursive, with a large initial "D" and "H".

Dennis G. Howard, II
Lawrence W. Cook
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204
502-696-5453

Attorney General's Supplemental Requests for Information
Case Number 2005-00186

* * * * *

1. State whether your company has changed any tariffs applicable to plans described, named or marketed as "unlimited", as previously identified in your responses to the Commission's first data request, since the date of the Commission's first set of Data Requests, and if so, please attach / enclose copies of same.

2. With regard to any such plans, state specifically whether the word "unlimited" refers to minutes of use, area(s) of calling, or both. If the word "unlimited" modifies any other term(s) in the applicable tariff(s), please identify the term(s) so modified.

3. With regard to any such plans, state:
 - a. whether the tariff indicates that a penalty of any type or sort (including relegating the customer to a different plan) may apply in the event the customer exceeds any limitation on number of minutes included in the plan;
 - b. the nature of the penalty;
 - c. whether the penalty has ever been imposed;
 - d. whether notice of the penalty is provided to the consumer, and if so, identify precisely where in the tariff or other materials (including but not limited to contract, advertising or marketing materials) any such notice is located, and cite the complete language of any and all such notice(s).

Certificate of Service

Counsel certifies filing of the original and ten photocopies of the Attorney General's Supplemental Requests For Information by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, service of the filing was by mailing a true and correct of the same, first class postage prepaid, to

Kevin Allen
Excel Telecommunications, Inc.
2440 Marsh Lane
Carrollton, TX 75006

Kevin Allen
VarTec Solutions, Inc.
2440 Marsh Lane
Carrollton, TX 75006

Sylvia Anderson
AT&T Communications of the South
Central States, LLC
1230 Peachtree Street, N.E.
Room 4W41
Atlanta, GA 30309

Melissa Burris
MCI Network Services, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328

Mary Campbell
NuVox Communications, Inc.
Two North Main Street
Greenville, SC 29601

Kyle Coats
EveryCall Communications, Inc.
10500 Coursey Boulevard
Suite 306
Baton Rouge, LA 70816

Joan Coleman
Vice Pres.-Regulatory & External Aff
BellSouth Telecommunications, Inc.
601 West Chestnut Street, Room 410
P. O. Box 32410
Louisville, KY 40232

Alan Creighton
Momentum Telecom, Inc.
2700 Corporate Drive
Suite 200
Birmingham, AL 35243

Karen Gillespie
Compliance Reporting Consultant
Trinsic Communications, Inc.
c/o Technologies Management, Inc.
P. O. Drawer 200
Winter Park, FL 32789

Todd Heinrich
Aero Communications, LLC
1301 Broadway
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Linda Hunt
Director/Legal & Regulatory Affairs
Lightyear Network Solutions, Inc.
1901 Eastpoint Parkway
Louisville, KY 40223

Daniel Logsdon
Alltel Kentucky, Inc.
229 Lees Valley Road
Shepherdsville, KY 40165

Daniel Logsdon
Vice President-External Affairs
Alltel Communications, Inc.
P. O. Box 1650
Lexington, KY 40588-1650

Felicia Mayo
Comm South Companies, Inc.
P. O. Box 821269
Dallas, TX 75382

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Network Telephone Corporation
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Pensacola, FL 32501

Mark Romito
Director - Government Relations
Cincinnati Bell Telephone Company
201 East Fourth Street
P. O. Box 2301
Cincinnati, OH 45201-2301

William B. Saxon
Vertex Communications, Inc.
210 East Main Street
Walhalla, SC 29691

Charles L. Schneider, Jr.
BullsEye Telecom, Inc.
25900 Greenfield Road
Suite 330
Oak Park, MI 48237

Jennifer Sikes
1-800 RECONEX, Inc.
dba USTel
2500 Industrial Avenue
P. O. Box 9
Hubbard, OR 97032-0009

Sprint Communications Company
Southeast Division
3065 Cumberland Circle, SE
Mailstop GAATLD0602
Atlanta, GA 30339

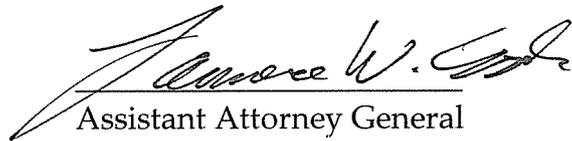
Robin H. Taylor, Manager
Business Implementation &
BellSouth Long Distance, Inc.
400 Perimeter Center Terrace
Suite 400
Atlanta, GA 30346

Bell Atlantic Communications, Inc.
Verizon-Nynex Long Distance Co dba
Verizon Enterprise Solutions
John Broten Dir. Reg. Group
1320 N. Courthouse Road 9th Floor
Arlington, VA 22201

Lisa Lezotte, Regulatory
ACN Communication Services, Inc.
32991 Hamilton Court
Farmington, MI 48334

Access Integrated Networks, Inc.
4885 Riverside Dr.
Macon, GA 31210

all on this 27th day of December, 2005.


Assistant Attorney General